

EXHIBIT P

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

JASON WILLIAMS,
Plaintiff,

ORIGINAL

vs.

Case No. 5:19-cv-00475-BO

AT&T MOBILITY, LLC,
Defendant.

****HIGHLY CONFIDENTIAL****
DEPOSITION OF ROBERT ARNO
30(b)(6)

February 28, 2022

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12:03 p.m. to 4:27 p.m. EST

REMOTELY REPORTED VIA VIDEO CONFERENCING

REPORTED BY:

Tamara L. Houston
CA CSR No. 7244, RPR, CCRR No. 140
FILE NO. 22-108895

1 is an asset protection number, appears to be?

2 A. Correct.

3 Q. Okay. What is an asset protection number?

4 A. That's like a case that would be assigned
14:35:32 5 to me or one of my peers.

6 Q. Okay. Is that number specifically -- or
7 typically assigned to a particular customer,
8 particular event, a particular account? How does it
9 work?

14:35:52 10 A. That depends on circumstances.

11 Q. Okay.

12 A. It's not absolute.

13 Q. Is it sometimes associated with a
14 particular customer?

14:36:03 15 A. Sometimes.

16 Q. Is it possible for a particular customer or
17 a particular account to have multiple asset
18 protection numbers associated with it?

19 A. Yes.

14:36:14 20 Q. And then -- again on the next column, the
21 first -- the first words there are "Asset Protection
22 Event."

23 Do you know what that means? Do you know
24 what an asset protection event is?

14:36:32 25 A. I would classify that as an asset

1 protection case. I wouldn't claim it as an event,
2 but without seeing the document, I can't really
3 answer.

4 Q. Okay. What is an asset protection case?

14:36:52 5 A. For instance, if someone stole a company
6 vehicle today, that would be an asset protection
7 case.

8 Q. Well, that's -- well, okay. That could --
9 that could be, but what -- what makes it an event?

14:37:07 10 Just somebody stealing a vehicle doesn't make it a
11 case, right? I mean, what -- what -- when does it
12 become a case?

13 A. Either when somebody like myself creates
14 the case or somebody in the asset protection case
14:37:22 15 intake team creates a case.

16 Q. Okay. Is there any sort of list or
17 database or -- or drive or something where you can
18 see all of the asset protection cases associated with
19 a particular account?

14:37:52 20 A. A specific account? I -- I wouldn't say
21 "yes" to that.

22 Q. Okay. If you were trying to ascertain if a
23 particular account had been the subject of more than
24 one asset protection case, is there any way for you
14:38:09 25 to figure that out?